

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

NATIONAL SALVAGE &
SERVICE CORPORATION,

Plaintiff,

V.

SULA VALLEY BIOGAS, SA DE
C.V. and HONDURAN GREEN
POWER CORPORATION,

Defendants.

C.A. No. 22-1428-TMH

**UNSWORN DECLARATION OF
CHRISTOPHER FITZPATRICK CANNATARO**

I, Christopher Fitzpatrick Cannataro, declare as follows:

1. I am an attorney at the law firm of Abrams & Bayliss LLP and represent Plaintiff, National Salvage & Service Corporation, (“NSSC” or “Seller”) in the above-referenced matter.

2. This Declaration is submitted for enabling the Clerk of the United States District Court for the District of Delaware to enter a default against Defendants, Sula Valley Biogas, SA de C.V (“Sula Valley”) and Honduran Green Power Corporation (“HGPC”) under Federal Rule of Civil Procedure 55(a).

3. On October 28, 2022, NSSC filed its Complaint (the “Complaint”) against Sula Valley and HGPC.

4. On November 17, 2022, Sula Valley and HGPC were properly served with a copy of the summons and Complaint. Proof of Delivery and the Court's Affidavit of Service are attached hereto as Exhibit 1.

5. Under Rule 12 (a)(1)(A)(i) of the Federal Rules of Civil Procedure, HGPC and Sula Valley had 21 days, up to and including December 8, 2022, to answer or otherwise respond to the Complaint. *See, e.g., Leon v. Continental AG*, 176 F. Supp. 3d 1315, 1319 (S.D. Fla. 2016) ("The time periods for responding to a complaint set[] forth in Fed. R. Civ. P. 12(a)(1)(A) apply to a defendant served abroad."); *SCRA Corp. v. Trajes Internacionales de Costa Rica, S.A.*, 1999 WL 718650, at *1–3 (E.D. Pa. August 30, 1999) (concluding that Fed. R. Civ. P. 12(a)(1)(A) applies to a defendant served abroad).

6. As of the date of this Declaration, neither HGPC nor Sula Valley have answered or otherwise responded to the Complaint.

7. Sula Valley and HGPC are corporations and therefore neither incompetent nor minors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 20, 2023



Christopher Fitzpatrick Cannataro

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

National Salvage & Service Corporation

Plaintiff,

v.

Sulla Valley Biogas, SA DE C.V. et al

Defendant,

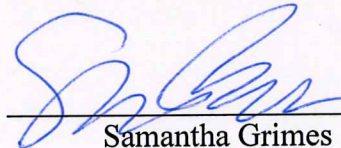
CA: 22-1428-GBW

AFFIDAVIT

I, Samantha M. Grimes, Deputy Clerk, being first sworn, depose and say that pursuant to Rule 4(f)(2)(C)(ii) of the Federal Rules of Civil Procedure, I did send on November 14, 2022, by UPS, the Summons, Complaint with Exhibits, Plaintiff's 7.1 Disclosure Statement, Affidavit of Christopher Cannataro, and Notice/Consent of Availability of a United States Magistrate Judge to Exercise Jurisdiction forms in the above referenced case to the following addresses:

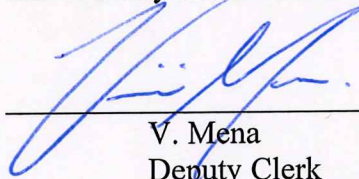
Sulla Valley Biogas, SA DE C.V.
Attention: President
Zona Libre Zip Choloma
Carretera La Jutosa
Choloma, Cortes, 21112
Hondura

Honduran Green Power Corporation
Attention: President Jesus Juan Canahuati
Zola Zip Choloma II, KM 1.5
Carretera La Jutosa
Choloma, Cortes, 21112
Honduras



Samantha Grimes
Deputy Clerk

Sworn to and subscribed before me
this 16th day of November 2022


V. Mena
Deputy Clerk



Shipping Receipt

Mail Express & Services, LLC

24A Trolley Square

Wilmington Delaware, 19806

302-652-0808

**PROCESS A DROP OFF
PACKAGE/SHIPMENT**

Date: 11/14/2022

Carrier: UPS

*Track your package at **UPS.Com***

*Thank you for using Mail Express and Services for
your shipping needs.*

Tracking No.:

1Z21201XD987002426

1Z21201X0420337007

Signature: N

This receipt lists each package received by the identified store intended for tendering to UPS for delivery services and indicates that the store has transmitted information on the listed packages to UPS data systems. This receipt is not confirmation that the store has tendered any or all of the listed packages to UPS. To verify when and if a package is tendered to UPS and its actual transit status, go to www.UPS.com.

**Mail Express is not responsible for Damage,
stolen, misdelivery, outside this facility.**

Signature:

FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2022 NOV 16 AM 9:02

OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

John A. Cerino
CLERK OF COURT

844 North King Street, Unit 18
Wilmington, DE 19801-3570
www.ded.uscourts.gov
(302) 573-6170

November 14, 2022

VIA UPS
RETURN RECEIPT REQUESTED

Sulla Valley Biogas, SA DE C.V.
Attention: President
Zona Libre Zip Choloma
Carretera La Jutosa
Choloma, Cortes, 21112
Hondura

Honduran Green Power Corporation
Attention: President Jesus Juan Canahuati
Zola Zip Choloma II, KM 1.5
Carretera La Jutosa
Choloma, Cortes, 21112
Honduras

RE: National Salvage & Service Corporation v. Sulla Valley Biogas et al
Civil Action No. 22-1428-GBW

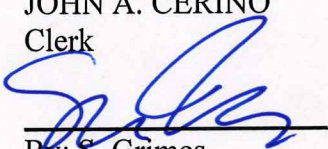
Dear Sir or Madam:

Enclosed please find the Summons, Complaint with Exhibits, and Plaintiff's 7.1 Disclosure Statement, and Letter request with supporting affidavit by Christopher Cannataro for Service. This service is made pursuant to Federal Rules of Civil Procedure, Rule 4 (f)(2)(C)(ii).

Also enclosed are Notice/Consent of Availability forms for Exercise of Jurisdiction by a United States Magistrate Judge.

Sincerely,

JOHN A. CERINO
Clerk


By: S. Grimes
Deputy Clerk

cc: Christopher Fitzpatrick Cannataro, Esquire
Enc.



Shipment Receipt: Page #1 of 1

THIS IS NOT A SHIPPING LABEL. PLEASE SAVE FOR YOUR RECORDS.

SHIP DATE:
MON 14 NOV 2022

EXPECTED DELIVERY DATE:
WED 16 NOV 2022 EOD
SHIP FROM:
DISTRICT OF DELAWARE
U.S. DISTRICT COURT
844 N KING ST
WILMINGTON DE 19801

(302) 573-6170

SHIP TO:
HONDURAN GREEN POWER CORP
ATTN PRES. JESUS JUAN CANAHUANTI
ZOLA ZIP CHOLOMA II, KM 1.5
CARRETERA LA JUTOSA
CHOLOMA 21112
HONDURAS
BUSINESS
3027781153
SHIPPED THROUGH:
THE UPS STORE #1391
WILMINGTON, DE 19807-2018
(302) 429-9780

SHIPMENT INFORMATION:
UPS WORLDWIDE SAVER
1 lb 0.0 oz manual wt
1.000 lb billable wt
CARRIER LETTER
SIG REQ (W/DELU CONFIRM)

TRACKING NUMBER: 1Z21201XD987002426
SHIPMENT ID: MMAHVPKBR3KA
SHIP REF 1: 11/14/22L
SHIP REF 2: - -

DESCRIPTION OF GOODS:
COMPLAINT & SUMMONS

SHIPMENT CHARGES:	
WORLDWIDE SAVER	124.00
SERVICE OPTIONS	11.00
FUEL SURCHARGE	31.57
CNS PROCESSING FEE	0.22

TOTAL	\$167.59
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COMPLETE ONLINE TRACKING: ENTER THIS ADDRESS IN YOUR WEB BROWSER TO TRACK:
[HTTP://THEUPSSTORE.COM](http://theupsstore.com) (SELECT TRACKING, ENTER SHIPMENT ID #) SHIPMENT
QUESTIONS? CONTACT SHIPPED THROUGH ABOVE.

CUSTOMER ACKNOWLEDGEMENT: I ACKNOWLEDGE AND ACCEPT TERMS & CONDITIONS IN FORCE
FOR TENDERING SHIPMENTS THROUGH THIS LOCATION AND CERTIFY THAT ADDRESS, CONTENTS
AND VALUES PROVIDED FOR THIS SHIPMENT ARE ACCURATE IN ALL RESPECTS.

Signature: _____

SHIPMENT ID: MMAHVPKBR3KA

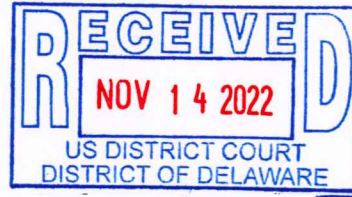


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11/14/2022 03:24 PM Pacific Time F

The UPS Store®



SEE NOTICE ON REVERSE regarding UPS Terms, and notice of limitation of liability. Where allowed by law, shipper authorizes UPS to act as forwarding agent for export control and customs purposes. If exported from the US, shipper certifies that the commodities, technology or software were exported from the US in accordance with the Export Administration Regulations. Diversion contrary to law is prohibited.
R00 R 1022

**Shipment Receipt: Page #1 of 1**

THIS IS NOT A SHIPPING LABEL. PLEASE SAVE FOR YOUR RECORDS.

SHIP DATE:
MON 14 NOV 2022EXPECTED DELIVERY DATE:
WED 16 NOV 2022 EOD
SHIP FROM:
DISTRICT OF DELAWARE
U.S. DISTRICT COURT
844 N KING ST
WILMINGTON DE 19801

(302) 573-6170

SHIP TO:
SULLA VALLEY BIOGAS, SA DE CV
ATTN: PRESIDENT
ZONA LIBRE ZIP CHOLOMA
CARRETERA LA JUTOSA
CHOLOMA 21112
HONDURAS
BUSINESS
3027781153
SHIPPED THROUGH:
THE UPS STORE #1391
WILMINGTON, DE 19807-2018
(302) 429-9780SHIPMENT INFORMATION:
UPS WORLDWIDE SAVER
0 lb 12.3 oz actual wt
1.000 lb billable wt
CARRIER LETTERTRACKING NUMBER: 1Z21201X0420337007
SHIPMENT ID: MHAHYPKKX3XM
SHIP REF 1: 11/14/22L
SHIP REF 2: - -DESCRIPTION OF GOODS:
COMPLAINT & SUMMONSSHIPMENT CHARGES:
WORLDWIDE SAVER 124.00
SERVICE OPTIONS 0.00
FUEL SURCHARGE 28.83
CHS PROCESSING FEE 0.22

TOTAL \$153.05

COMPLETE ONLINE TRACKING: ENTER THIS ADDRESS IN YOUR WEB BROWSER TO TRACK:
[HTTP://THEUPSSTORE.COM](http://THEUPSSTORE.COM) (SELECT TRACKING, ENTER SHIPMENT ID #) SHIPMENT
QUESTIONS? CONTACT SHIPPED THROUGH ABOVE.CUSTOMER ACKNOWLEDGEMENT: I ACKNOWLEDGE AND ACCEPT TERMS & CONDITIONS IN FORCE
FOR TENDERING SHIPMENTS THROUGH THIS LOCATION AND CERTIFY THAT ADDRESS, CONTENTS
AND VALUES PROVIDED FOR THIS SHIPMENT ARE ACCURATE IN ALL RESPECTS.

Signature:

SHIPMENT ID: MHAHYPKKX3XM

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11/14/2022 03:31 PM Pacific Time F

The UPS Store®



SEE NOTICE ON REVERSE regarding UPS Terms, and notice of limitation of liability. Where allowed by law, shipper authorizes UPS to act as forwarding agent for export control and customs purposes. If exported from the US, shipper certifies that the commodities, technology or software were exported from the US in accordance with the Export Administration Regulations. Diversion contrary to law is prohibited. RRD R 1022

Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1Z21201XD987002426

Weight

1.00 LBS

Service

UPS Worldwide Saver®

Shipped / Billed On

11/14/2022

Additional Information

Signature Required

Delivered On

11/17/2022 3:30 P.M.

Delivered To

SAP, HN

Received By

LORENZO TREJO

Please print for your records as photo and details are only available for a limited time.

Sincerely,

UPS

Tracking results provided by UPS: 01/18/2023 4:11 P.M. EST

Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1Z21201X0420337007

Weight

0.80 LBS

Service

UPS Worldwide Saver®

Shipped / Billed On

11/14/2022

Delivered On

11/17/2022 2:00 P.M.

Delivered To

SAP, HN

Received By

FIRMA

Please print for your records as photo and details are only available for a limited time.

Sincerely,

UPS

Tracking results provided by UPS: 01/18/2023 4:10 P.M. EST